

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

BRIGHT CAPTURE LLC,

Plaintiff,

v.

ZOHO CORPORATION,

Defendants.

Case No. 6:22-cv-48

CASE READINESS STATUS REPORT

Plaintiff Bright Capture LLC (“Plaintiff”) and Defendant Zoho Corporation (“Defendant”) hereby provide the following status report.

SCHEDULE

A scheduling order has not yet been filed.

FILING AND EXTENSIONS

Plaintiff’s Complaint was filed on January 13, 2022. There was one 45-day extension of Defendant’s period for responding to the Complaint.

RESPONSE TO THE COMPLAINT

Defendant filed its Answer and Affirmative Defenses on April 22, 2022.

PENDING MOTIONS

Defendant filed a motion for intradistrict transfer on April 22, 2022. After the parties conducted jurisdictional discovery, Plaintiff filed its opposition on July 8, 2022. Defendant filed its reply in support of its transfer motion on July 22, 2022.

Defendant intends to file a motion for judgment on the pleadings challenging the validity of the asserted patents for being directed to an abstract idea.

RELATED CASES IN THIS JUDICIAL DISTRICT

The following related cases are currently pending in this judicial district: (1) *Bright Capture LLC v. Rydoo NV*, 6:22-cv-405-ADA; and (2) *Bright Capture LLC v. GB Group plc*, 6:22-cv-537-ADA. *Bright Capture v. Rydoo* involves two of the patents asserted in this case. *Bright Capture v. GB Group* involves one of the patents asserted in this case.

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff's Complaint asserted three patents and a total of six claims. The asserted patents are U.S. Patent No. 10,049,410; U.S. Patent No. 10,453,151; and U.S. Patent No. 8,693,070.

APPOINTMENT OF TECHNICAL ADVISER

The parties do not request a technical adviser to be appointed to the case to assist the Court with claim construction or other technical issues.

MEET AND CONFER STATUS

Plaintiff and Defendant met and conferred. Other than a motion to transfer venue as noted above and the motion for judgement on the pleadings, the parties have no pre-Markman issues to raise at the CMC.

This 8th day of August, 2022.

/s/ Courtney S. Alexander
Cortney S. Alexander
cortneyalexander@kentrisley.com
KENT & RISLEY LLC
Tel: (404) 855-3867
5755 N Point Pkwy Ste 57
Alpharetta, GA 30022

Attorneys for Plaintiff

/s/ Ryan J. Marton
Ryan J. Marton (Admitted Pro Hac
Vice)
ryan@martonribera.com
Carolyn Chang (Admitted Pro Hac
Vice)
carolyn@martonribera.com
Phillip Haack (Admitted Pro Hac Vice)
phaack@martonribera.com
MARTON RIBERA SCHUMANN
& CHANG LLP
548 Market St., Suite 36117
San Francisco, CA 94104
Telephone: (415) 360-2515
Darryl Adams
Texas State Bar No. 00796101
dadams@sgbfirm.com
SLAYDEN GRUBERT BEARD PLLC
401 Congress Ave., Ste. 1650
Austin, Texas 78701
Telephone: (512) 402-3550
Facsimile: (512) 402-6865

Attorneys for Defendant